

ISO 22000 OLD versus NEW

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Both old and new food safety management standards cover essentially the same topics. However, there are important differences. Some of these are discussed below.

Structure of standard

Perhaps the biggest difference between the old and the new standard is the structure. ISO 22000 2005 had five main sections (4 to 8) and ISO 22000 2018 now has seven (4 to 10). This is because the new edition uses the Annex SL* template. According to ISO, all future management system standards (MSSs) will use this new layout and share the same basic requirements. As a result, all new MSSs will have the same basic look and feel.

A common structure is possible because basic concepts such as *management, customers, requirements, policy, procedure, planning, performance, objective, control, monitoring, measurement, auditing, decision making, corrective action, and nonconformity* are common to all management system standards. While this makes it easier for organizations to implement multiple standards because they all share the same basic requirements, it may cause some disruption in the short run as organizations get used to the new structure.

*Annex SL defines the framework of a generic management system standard (MSS). In addition to ISO 22000, the following MSSs either have been or will be updated using this new ISO framework: [ISO 9001](#), [ISO 13485](#), [ISO 14001](#), [ISO 22301](#), [ISO 27001](#), [ISO 45001](#), [ISO 50001](#), [AS9100](#), and IATF 16949.

Context of the organization

Unlike the old ISO standard, the new one expects you to understand your organization's *context* before you establish its FSMS. When ISO 22000 2018 asks you to understand your organization's *context* it wants you to consider the external and internal issues that are relevant to its purpose and strategic direction and to think about the influence these issues could have on its FSMS and the results it intends to achieve.

This means that you need to understand your organization's external environment, its culture, its values, its performance, and its interested parties before you develop its FSMS. Why? Because your FSMS will need to be able to manage all of these influences.

And once you understand all of this, you're expected to use this insight to help you define the scope of your FSMS and the challenges it must deal with. While this will help ensure that organizations develop unique food safety management systems that address their own unique needs and requirements, doing all of this could be quite a challenge for some organizations.

Documented information

The new ISO 22000 2018 standard has also eliminated the long standing distinction between documents and records. Now they are both referred to as "*documented information*". Why ISO chose to abandon two common sense concepts and replace them with one that is needlessly awkward and esoteric is not entirely clear.

According to ISO's definition, the term *documented information* refers to *information that must be controlled and maintained and the medium on which it is contained*. So, whenever ISO 22000 uses the term documented information it implicitly expects you to control and maintain that information.

While ISO 22000 2018 expects you to maintain *documented information*, it no longer explicitly expects you to write procedures or prepare a food safety manual. While you may continue to use procedures and manuals if you wish, they're no longer required.

Risk-based thinking

According to ISO, *risk-based thinking* has always been implicit in management system standards. According to this perspective, ISO 22000 has always been about anticipating and preventing mistakes, which is what *risk-based thinking* is all about.

That's why we train people, why we plan our work, why we assign roles and responsibilities, why we validate and verify results, why we audit and review activities, and why we monitor, measure, and control processes. We do these things because we want to prevent mistakes. We do them because we're trying to manage risk. So, if we think of risk-based thinking in this way, it's reasonable to say that risk-based thinking has always been an inherent part of ISO 22000. Before it was implicit; now it's explicit.

So, what kind of thinking is *risk-based thinking* and how is it applied? What does the new standard expect organizations to do? The new standard expects organizations to identify and address the risks that could influence their ability to provide safe products and services and to satisfy customers. It also expects them to identify and address the opportunities that could enhance their ability to provide safe products and services and to satisfy customers.

The new ISO 22000 standard also expects organizations to identify the risks and opportunities that could influence the performance of their food safety management systems or disrupt their operation and then it expects them to define actions to address these risks and opportunities. It then further expects them to figure out how they're going to make these actions part of their FSMS processes and how they're going to implement, control, evaluate, and review the effectiveness of these actions and these processes.

While risk-based thinking is now an essential part of the new standard, it does not actually expect you to implement a formal risk management program, nor does it expect you to document your risk-based approach. If you choose to implement a formal risk management program, please see the ISO 31000 risk management guide at: www.praxiom.com/31000.htm

Emergencies and incidents

While the old ISO 22000 standard had only a single sentence on emergency preparedness and response (5.7), the new standard has added a new section on the handling of emergencies and incidents (8.4.2). The new section 8.4.2 expects you to consider its emergency response requirements, to prepare for and respond to food safety incidents and emergencies, and to mitigate their impact. It also expects you to periodically test your emergency response procedures and to review the associated documents and records.

New definitions

While the old ISO 22000 standard had only 17 definitions, the new one now has 45. While most of the new definitions relate to management systems in general, some of them relate to food safety management systems in particular.

New management system definitions were added for the following terms: *competence, continual improvement, documented information, effectiveness, interested party (stakeholders), management system, measurement, nonconformity, objective, outsource, organization, performance, policy, process, product, requirement, risk, top management, and traceability*. And new food safety definitions were added for the following terms: *acceptable level, action criteria, animal food, contamination, feed, food, and lot*.

Most of the new management system definitions were added because ISO decided to use a new format (Annex SL) for all management system standards. A complete set of definitions can be found at [ISO 22000 2018 Definitions](#).

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